

BRESSLER, AMERY & ROSS

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November 4, 2011

Via Electronic Court Filing System (ECF)

Clerk, U.S. District Court
Eastern District of New York
100 Federal Plaza
Central Islip, NY 11722

Re: *Lia v. Saporito*, Civil Case No. CV-11-3621 (E.D.N.Y. 2011)
W&D Imports, Inc. v. Lia, Civil Case No. CV-11-4144 (E.D.N.Y. 2011)
Notice of Motion to Intervene and for Consolidation ~ Bundle Rule Filing

Dear Sir or Madam:

This office represents W&D Imports, Inc. d/b/a Willis Honda and David Davis. Pursuant to the Individual Rules of the Honorable Sandra J. Feuerstein, U.S.D.J., Rule 4E, we are filing via ECF the following motion papers in both matters referenced above:

1. Willis Honda's and Davis' Motion to Intervene pursuant to Federal Rule of Civil Procedure 24 and for consolidation with *W&D Imports, Inc. v. Lia, et al.*, Civil Case No. CV-11-4144 (E.D.N.Y. 2011) pursuant to Federal Rule of Civil Procedure 42; Memorandum of Law; Affidavit of Ronald J. Campione, Esq.; and proposed Order;
2. American Honda Motor Co., Inc.'s Conditional Assent to Motion to Consolidate;
3. Defendant Michael Saporito's Memorandum in Opposition to Willis Plaintiffs' Motion to Intervene and Consolidate; and Declaration in Support of Defendant's Opposition with Exhibits;
4. Defendants Michael Saporito, Jessie Armstead, All Star Motors, LLC and Allstar Motors of L.I., Inc. (collectively "All Star Defendants") Brief in Opposition to Plaintiffs' Motion to Intervene and Consolidate; and Declaration of Service;

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5. Plaintiffs Don Lia, Mobile Management, LLC and N.R. Automotive, Inc.'s Memorandum of Law in Opposition to the Motion of Non-Party Intervenor W&D Imports, Inc. d/b/a Willis Honda and David Davis for Intervention and Consolidation; and
6. W&D Imports, Inc. d/b/a Willis Honda and David Davis' Memorandum in Reply to Defendants' Oppositions to Motion for Intervention and Consolidation; and Affidavit of Service.

By copy hereof, we are serving a courtesy copy of the motion papers upon the Honorable Sandra J. Feuerstein, U.S.D.J. and Magistrate Judge E. Thomas Boyle, via Federal Express. A true and complete copy of the motion papers is being served upon all counsel via ECF, Email and/or First-Class Mail.

We appreciate the Court's attention to this matter.

Very truly yours,



ERIC L. CHASE

ELC:eak

Enclosures

cc: Honorable Sandra J. Feuerstein, U.S.D.J. (*Via Federal Express*)
Honorable E. Thomas Boyle, U.S.M.J. (*Via Federal Express*)
All Counsel on Attached "Counsel List"

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COUNSEL LIST

Lia v. Saporito, Civil Case No. CV-11-3621 (E.D.N.Y. 2011):

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Matthew Brian Weinick, Esq. (*Attorney for Michael Saporito*)

W&D Imports, Inc. v. Lia, Civil Case No. CV-11-4144 (E.D.N.Y. 2011):

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